

KRIEGER KIM & LEWIN LLP

500 Fifth Avenue  
New York, NY 10110

Telephone: (212) 390-9550  
[www.KKLLlp.com](http://www.KKLLlp.com)

March 26, 2021

By ECF

The Honorable Raymond J. Dearie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:     *United States v. Jose Carlos Grubisich, 19 Cr. 102 (RJD)***

Dear Judge Dearie:

We write on behalf of Mr. Jose Carlos Grubisich to respectfully request that the Court allow the parties to advise the Court on April 1, 2021 regarding the status of the case and to make a request for the scheduling of a status conference or other hearing. The government consents to this request. The parties continue to engage in discussions regarding a potential resolution of this case, and we hope to be in a position to provide a definitive update for the Court by April 1.

On March 4, 2021, the Court adjourned *sine die* the status conference scheduled for March 5 and ordered the parties to provide an update on the status of the case by March 15. *See* March 4, 2021 Electronic Order. In written correspondence, the parties and Court personnel subsequently agreed to extend that deadline. On March 19, in response to the parties' joint request for additional time, the Court requested a status update on or before today, March 26. *See* March 19, 2021 Electronic Order. During the last status conference on November 9, 2020,

March 26, 2021

Page 2 of 2

the Court excluded time under the Speedy Trial Act until July 19, 2021. *See* November 9, 2020 Minute Entry.

Respectfully submitted,

By: /s/ Edward Y. Kim

KRIEGER KIM & LEWIN LLP  
500 Fifth Avenue, 34th Floor  
New York, New York 10110  
Tel.: (212) 390-9550  
[Edward.Kim@KKLlp.com](mailto:Edward.Kim@KKLlp.com)  
[Henry.Ross@KKLlp.com](mailto:Henry.Ross@KKLlp.com)

BRACEWELL LLP  
1251 Avenue of the Americas, 49th Floor  
New York, New York 10020  
Tel.: (212) 508-6100  
[Paul.Shechtman@Bracewell.com](mailto:Paul.Shechtman@Bracewell.com)

*Attorneys for Jose Carlos Grubisich*

cc: All counsel of record